

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Creation of a Low Power Radio Service)	MM Docket No. 99-25
)	
Amendment of Service and Eligibility Rules for FM Broadcast Translator Stations)	MB Docket No. 07-172, RM-11338
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To the Commission:

**Reply Comments of Nickolaus E. Leggett
To the Petition for Reconsideration from Let the Cities In!**

I am a certified electronics technician (ISCET and iNARTE) and an Extra Class amateur radio operator (call sign N3NL). I hold an FCC General Radiotelephone Operator License with a Ship Radar Endorsement. I am an inventor holding three U.S. Patents. My latest patent is a wireless bus for digital devices and computers (U.S. Patent # 6,771,935). I have a Master of Arts degree in Political Science from the Johns Hopkins University

I am one of the original petitioners for the establishment of the Low Power FM (LPFM) radio broadcasting service (RM-9208 July 7, 1997 subsequently included in MM Docket 99-25). I am also one of the petitioners in the docket to establish a low power radio service on the AM broadcast band (RM-11287). I have filed a total of over 200 formal comments with the FCC over the years since the 1970s. I have filed comments with other Federal agencies as well including the USPTO, FAA, FERC, EPA, and the TSA.

My Reply Comments

As one of the initial petitioners for Low Power FM (LPFM) radio broadcasting, I strongly support the Petition for Reconsideration in this docket filed by the Let the Cities In! organization. In that petition, Let the Cities In! recommends that very low power LPFM broadcast stations be licensed for specific urban neighborhoods and communities. These very low power stations would have small coverage areas that would cover individual neighborhoods and also allow several such local stations to be installed in a single large city.

The initial idea of LPFM was very low power stations transmitting about 1 Watt or so of output power to provide local broadcast service to an individual neighborhood. This type of station would be operated by the neighborhood residents themselves and would present programming created by the neighborhood for the neighborhood. This type of LPFM would allow individual ghettos and barrios the ability to improve themselves and provide self-training in the art of broadcasting. This fine plan for neighborhood self-help has been largely lost in an LPFM service that consists of higher power stations (100 Watts) that function as scale models of conventional high-power non-profit broadcasting.

LP10 FM Broadcast Stations

The Commission established a neighborhood-level license in the form of the LP10 stations. These stations would have an output power on the order of 10 Watts and they would serve a neighborhood or community. The Commission has now cancelled this type of station without trying to license a single LP10 station. This cancellation step just does not make any sense. When I was an undergraduate college student at Wesleyan University (in Middletown, Ct.), we had a Class D FM broadcast station that operated just fine for many years with very low

power. This broadcast station was WESU-FM which has now been converted into a high-power non-profit broadcast station.

What Do We Say to Minority People?

Now that the Commission has cancelled the LP10 broadcast stations, what do we say to the residents of the barrios and the ghettos of the United States of America? Do we say: “We are sorry but you will never have your own broadcast medium to build up your community and to provide broadcasting instruction to your community”? Do we say “You will never have this major opportunity to lift yourself out of poverty and hopelessness”? Is the Commission proud of this situation where minority people are told to go away and forget about broadcasting?

Recommended Actions

The Commission should reconsider its actions, and issue some LP10 broadcast licenses in the inner cities. Priority for these licenses should be granted to neighborhood groups in underprivileged areas of the cities.

In addition, the Commission should issue a Notice of Inquiry (NOI) on the potential use of a millimeter wave allocation for a Citizens Broadcast Band (CBB) where both individuals and local groups would be able to broadcast to their own neighborhoods providing their own program content. The CBB would be a medium where true freedom of speech would be enabled for each and every American citizen. In addition, I have proposed a lighthouse protocol which can make millimeter wave broadcasting practical. (Reference One)

Respectfully submitted,

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January 7, 2013

Reference One: Nickolaus E. Leggett, “It’s Time for a Lighthouse Protocol”, Radio World, June 30, 2011

In compliance with FCC rules, I have sent a paper copy of these reply comments to Let the Cities In! at the address below:

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